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Attorneys for Defendants
 RIMINI STREET, INC. and SETH RAVIN

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;)
 ORACLE AMERICA, INC., a Delaware)
 corporation; and ORACLE INTERNATIONAL)
 CORPORATION, a California corporation,)

Plaintiffs,

vs.

RIMINI STREET, INC., a Nevada corporation;)
 SETH RAVIN, an individual,)

Defendants.)

Case No. 2:10-cv-0106-LRH-PAL

**RIMINI STREET'S MOTION TO SEAL
 PORTIONS OF DEFENDANT RIMINI
 STREET INC.'S OPPOSITION TO
 ORACLE'S MOTIONS FOR
 EVIDENTIARY SANCTIONS AND
 EXHIBITS 1 - 3**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Defendant Rimini Street Inc. (“Rimini”) respectfully requests that the Court order the Clerk of the Court to file under seal certain portions of Rimini’s Opposition to Oracle’s Motion for Evidentiary Sanctions for Spoliation (“Rimini’s Opposition”) and Exhibits 1 - 3 thereto. These portions of Rimini’s Opposition reflect information that Rimini has designated “Confidential” under the Protective Order.

The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information—Attorneys’ Eyes Only’ under the terms of this Protective Order only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c). The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information—Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2.

I. CONFIDENTIAL MATERIAL DESIGNATED BY RIMINI.

Rimini has designated portions of its Opposition and Exhibits 1 - 3 as Confidential under the Protective Order. Rimini thus requests that the Court order the Clerk of the Court to file the designated portions of Rimini’s Opposition and Exhibits 1 - 3 under seal. Un-redacted versions of these documents were individually lodged under seal with the Court on June 18, 2012.

For non-dispositive motions the presumption of public access may be overcome by a showing of good cause under Rule 26(c). *See Pintos v. Pacific Creditors Ass’n*, 605 F.3d 665, 678 (9th Cir. 2010); *Kamakana v. Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006). A court has “broad latitude” under Rule 26(c) “to prevent disclosure of materials for many types of information, including, but not limited to, trade secrets or other confidential research, development, or commercial information.” *Phillips v. General Motors Corp.*, 307 F.3d 1206, 1211 (9th Cir. 2002) (citations omitted).

Exhibits 1 – 3 are documents or deposition testimony that have been designated as “Confidential,” reflecting Rimini’s judgment that these contain “non-public information or matter related to: . . . proprietary technical information and specifications; . . . or other commercially or personally sensitive or proprietary information.” Protective Order ¶ 3. In particular, Exhibits 1 – 3 contain confidential information relating to Rimini’s proprietary business processes. Courts have authority to shield such information from public view. Indeed, Fed.R.Civ.P. 26(c)(1)(G) anticipates that a court may require that “a trade secret or other confidential research, development, or commercial information not be revealed or be revealed only in a specified way.” *Selling Source, LLC v. Red River Ventures, LLC*, 2:09-CV-01491-JCM, 2011 WL 1630338 at *2 (D. Nev. Apr. 29, 2011).

For the foregoing reasons, Rimini respectfully requests that the Court find there is a compelling interest in filing portions of Rimini’s Opposition and Exhibits 1 - 3 under seal.

DATED: June 18, 2012

SHOOK, HARDY & BACON

By: /s/ Robert H. Reckers
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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of June, 2012, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, District of Nevada, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ Robert H. Reckers